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**Via Electronic Filing**

The Hon. Valerie Caproni, U.S.D.J.  
United States District Court, S.D.N.Y.  
40 Foley Square, Room 240  
New York, New York 10007

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**MEMO ENDORSED**

Re: KSFB Management LLC v. Galway Holdings, LP, No. 1:24-CV-04424-VEC/KHP,  
Letter Motion for Approval of Redacted Filing of Certain Exhibits

Dear Judge Caproni:

We represent Plaintiff KSFB Management, LLC (“KSFB”) in the above-referenced action. Pursuant to Rule 5 of Your Honor’s Individual Practices in Civil Cases, we write to request that the Court approve KSFB’s redacted filing of Exhibits B and E to the Declaration of Micky Segal in Support of Plaintiff’s Motion for Preliminary Injunction and Temporary Restraining Order dated June 25, 2024 (the “Segal Declaration”). KSFB respectfully submits that Exhibits B and E contain confidential business information and trade secret information of KSFB that should be protected from public disclosure by appropriate redactions.

Exhibit B is a proposed Account Purchase Agreement between KSFB and Defendant Galway Holdings, L.P. (“Galway”). KSFB seeks to redact statements therein assigning an EBIDTA value to a portion of KSFB’s business based on confidential and commercially sensitive business information previously disclosed to Galway. Exhibit E is a letter from a confidential client requesting a transition of their business from KSFB to Galway. KSFB seeks to redact therefrom the name of that confidential client. KSFB’s client list is part of its sensitive proprietary information and a trade secret at issue in this case.

As this Court has recognized, “the need to protect sensitive proprietary information is a countervailing interest that outweighs the presumption of access to judicial documents set forth in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 124 (2d Cir. 2006) and justifies the sealing” of an exhibit. ECF No. 14 at 2. Here KSFB seeks to file Exhibits B and E to the Segal Declaration with limited redactions in furtherance of that interest. KSFB will file under seal unredacted copies of those exhibits with its proposed redactions highlighted.

Accordingly, KSFB respectfully requests the Court approve the redacted filing of Exhibits B and E to the Segal Declaration. Thank you for the Court’s attention to this matter.

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Respectfully submitted,

/s/ Thomas J. McCormack

Thomas J. McCormack

cc: All Counsel of Record (by electronic filing and email)

Application GRANTED. The need to protect sensitive proprietary information is a countervailing interest that outweighs the presumption of access to judicial documents set forth in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 124 (2d Cir. 2006) and justifies the narrowly tailored redactions in the publicly filed exhibits to the Segal Declaration at Dkt. 17. The unredacted versions of the exhibits to the Segal Declaration at Dkt. 20 may remain under seal.

SO ORDERED.



6/26/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE